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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

AMTRUST NORTH AMERICA, INC.,)
a Delaware corporation; and)
TECHNOLOGY INSURANCE)
COMPANY, INC., a New Hampshire)
corporation,)

Plaintiffs,)

-vs-)

SAFEBUILT INSURANCE)
SERVICES, INC., a California)
corporation a/k/a SAFEBUILT)
WHOLESALE INSURANCE)
SERVICES, INC.,)
THE TAFT COMPANIES, LLC, a)
Maryland corporation,)
PREFERRED)
GLOBAL HOLDINGS, INC., a)
Montana corporation,)

Case No. MC-16-01-BLG-SPW-
CSO

(Related Case SD NY Case No. 14-
cv-9494)

**NOTICE RELATED TO
DEPOSITION IN
MISCELLANEOUS ACTION**

DAVID E. PIKE, individually, DAVID)
E. PIKE, INC., a Nevada corporation,)
PHILIP SALVAGIO, individually,)
SALMEN INSURANCE SERVICES,)
INC., a California corporation f/k/a)
SALVAGIO, INC., CARL M. SAVOIA,)
JOHN DOE CORPORATIONS 1-5, and)
JOHN DOES 1-5,)
Defendants.)
_____)

In furtherance of the related action, and the action in the Southern District of New York, Plaintiffs filed a Subpoena on the Office of the Montana State Auditor, Commissioner of Securities and Insurance ("CSI"), to discuss five (5) topics, only one (1) of which relates to the question of the confidential nature of an examination of Pacific Re, Inc. The deposition is set for March 14, 2016, pursuant to subpoena served on CSI and the Defendants on March 2, 2016. CSI has designated one or more people to be deposed on that date.

On March 10, 2016, CSI was provided with a copy of a motion to quash that was written by Defendants. It is unknown whether that motion has been filed with any court. The CSI informed Plaintiffs they intend to proceed with the deposition as scheduled, with the understanding agreed to by Plaintiffs that portions of the deposition dealing with the motion currently before the Court shall be sealed pending this court's decision on the confidentiality of certain material pursuant to Mont. Code Ann. § 33-28-108(3). At present, Plaintiffs have not received a copy or been served with the motion to quash, and given the CSI's confirmation it will attend, have secured travel arrangements from New York to Helena. Given the deadlines in the related action, and CSI's expressed willingness to move forward, Plaintiffs object to any stay of the upcoming deposition.

DATED this 11th day of March, 2016.

By: /s/ Perry J. Schneider
Perry J. Schneider

MILODRAGOVICH, DALE
& STEINBRENNER, P.C.

By: /s/ Michael D. Brown
Michael D. Brown

By: /s/ Matthew Bryant
Matthew Bryant

OHRENSTEIN & BROWN, LLP

Attorneys for Plaintiffs